

**Report for:** Regulatory Committee

**Item number:**

**Title:** Haringey's Housing Strategy 2017-2022

**Report authorised by :** Lyn Garner, Director of Regeneration, Planning and Development

**Lead Officer:** Mustafa Ibrahim, Head of Housing Commissioning, Investment and Sites

**Ward(s) affected:** All

**Report for Key/  
Non Key Decision:** Key decision

## **1. DESCRIBE THE ISSUE UNDER CONSIDERATION**

- 1.1 This report presents the final proposed draft of Haringey's Housing Strategy, following completion of a second stage of consultation. The vision and objectives in the draft strategy remain unchanged but this new version reflects a very different housing landscape and emphasises that implementation of the strategy will be challenging.
- 1.2 In addition to the final strategy, this report includes a summary of the consultation feedback and a new version of the Equalities Impact Assessment, updated to provide an assessment of the impact of the revised strategy.
- 1.3 This report is to be considered by Regulatory Committee and Cabinet each with a view to recommending adoption of the Strategy with or without amendment, and by Council for adoption of the Strategy.

## **2. CABINET MEMBER INTRODUCTION**

- 2.1 Haringey's new Housing Strategy sets out our strong belief that housing is fundamentally about people and communities , not just bricks and mortar. Housing is a critical factor in people's health, family relationships, educational attainment and general wellbeing. This is why we are placing a high priority on improving housing supply, quality and affordability, and people's access to it.
- 2.2 The Strategy sets out four key objectives that together aim to help to build strong, mixed communities in neighbourhoods that reflect the diversity of Haringey. This means not just new homes; it also means the jobs, training, facilities and services that communities need to thrive, it means support for people that need it and it means tackling inequality and barriers to access to housing.

- 2.3 The Strategy is being delivered in a very different housing world to October 2014, when we first agreed to go to consultation on a new strategy. Government policy is focused on promoting home ownership and this will have the effect of marginalising social housing and reducing the supply of affordable housing. Welfare changes have and will further hit some residents. These make achievement of the Strategy more challenging, and all the more vital to the future success of Haringey.
- 2.4 Haringey's Housing Strategy is not just a matter for the council. We have engaged partners and stakeholders and consulted residents widely. As we move into delivering the Strategy, it is clear that we will need to mobilise everyone involved – housing associations, developers, builders, investors and public agencies – to work with residents to tackle housing need in the borough in a way that realises our vision. I endorse the Strategy and look forward to the improvements that it will help to bring about, and the real difference it will make to people's lives.

### **3. RECOMMENDATIONS**

- 3.1 It is recommended that Regulatory Committee:
- (a) Notes and consider the feedback from and the response to the second stage consultation conducted on Haringey's Housing Strategy, set out in appendix 1, and considers the revised and final version of the Equalities Impact Assessment, attached as appendix 3.
  - (b) Make recommendations on the revised and final version of Haringey's Housing Strategy, attached as appendix 2 to this report.

It is recommended that Cabinet:

- 3.2 Notes and considers the feedback from and the response to the second stage consultation conducted on Haringey's Housing Strategy, set out in appendix 1.
- 3.3 Recommends the revised and final version of Haringey's Housing Strategy, attached as appendix 2 to this report, having considered the revised and final version of the Equalities Impact Assessment, attached as appendix 3, for adoption by Council.

It is recommended that Council:

- 3.4 Agree and adopt the revised and final version of Haringey's Housing Strategy, attached as appendix 2 to this report, having considered the feedback from and the response to the second stage consultation conducted on Haringey's Housing Strategy, set out in appendix 1 and the revised and final version of the Equalities Impact Assessment, attached as appendix 3

### **4. REASONS FOR DECISION**

- 4.1 Regulatory Committee is required to provide informal recommendations to Cabinet and Full Council about the draft Housing Strategy.

- 4.2 Cabinet is required to recommend that Council adopt the draft Housing Strategy.
- 4.3 A decision is required from Council formally to adopt Haringey's Housing Strategy, taking into account any recommendations from both Regulatory Committee and Cabinet.
- 4.4 Each body must consider the consultation responses, the changed national and local housing landscape and the updated Equalities Impact Assessment.

## **5. ALTERNATIVE OPTIONS CONSIDERED**

- 5.1 The Council already has a Housing Strategy in place covering the period 2009 – 2019, so it would be possible to continue with the current strategy. However, at its meeting in October 2014, the Cabinet rejected this approach given the scale of changes to housing policy since 2009. The scale of these changes has increased further since the general election in May 2015 and the introduction of the Housing and Planning Act 2016. The case for a new strategy is, therefore, now more compelling.
- 5.2 Council could also consider carrying out a simple review and refresh of the 2009 – 2019 strategy. However, the extent of the changes since 2009 are such that this would not enable the Council to adequately meet the challenges it faces.
- 5.3 Alternatively, the Council could rescind the housing strategy altogether and move forward without one as there is no statutory requirement for a local authority to produce a housing strategy. However, having a strategy is considered both best practice and necessary to articulate how the council will meet the housing challenges and deliver its housing objectives and priorities with its partners.
- 5.4 The final strategy represents recommended policy choices that aim to achieve the council's priorities. Alternative options were discounted where they:
- Would not have been consistent with the general tenor of consultation feedback;
  - Did not comply with current and forthcoming government legislation;
  - Would have represented policy choices that are unachievable given known and likely constraints.

## **6. BACKGROUND INFORMATION**

- 6.1 In October 2014, Cabinet approved the start of consultation on a new Haringey Housing Strategy. A first stage consultation on the proposed vision, principles and priorities for the new Housing Strategy took place over a six week period, between 20 October and 12 December 2014, and invited stakeholders to give their views. A report on the first stage consultation outcome, feedback from the Regulatory Committee on 3 March 2015 and a draft Housing Strategy were submitted to Cabinet in March 2015. At this meeting, Cabinet agreed that a second stage consultation exercise should be conducted on the full draft of the strategy.

- 6.2 Following announcements made in the Queen's Speech in May 2015, it was necessary to update the draft strategy in light of forthcoming changes to national housing policy. The amended draft strategy was agreed for consultation by the Leader of the Council in June 2015. The second stage consultation then took place over a 14 week period between 13 July and 18 October 2015. The consultation was promoted online, through social media and Haringey Council web communications. Posters and promotional materials were sent to key partners such as housing associations and voluntary sector organisations. A series of events for stakeholders were held during the consultation period.
- 6.3 There were 97 responses to the second stage consultation, in addition to the 330 responses received from the first stage consultation. At both stages, the consultation response was generally positive. A full report on the second stage consultation is contained in Appendix 1.
- 6.4 Broadly, four themes emerged from the consultation, where respondents felt the Council should change, clarify or strengthen the final strategy, as follows:
- Housing affordability: concern that current definitions of affordability exclude lower income households, including those reliant on benefits.
  - Supply of new homes: support for policies which increase the supply of new homes, bring empty homes back into use and improve allocations to social housing.
  - Vulnerable groups: support for a strategy which addresses the needs of residents with additional vulnerabilities or who face additional barriers to accessing suitable housing, for example disabled residents.
  - Council housing: concern that estate regeneration will demolish council housing without 1:1 replacement.

This feedback has been taken into account in the changes made to the draft strategy, which are summarised below.

### **Policy Developments**

- 6.5 A number of revisions were also required as a result of other changes and policy developments since the draft Housing Strategy was approved for consultation in June 2015. These include:
- (a) Aligning the affordable housing provisions and guidance to developers with the latest Local Plan, as approved by Cabinet.
  - (b) Reflecting Cabinet's approval of the procurement of an investment partner for the Haringey Development Vehicle and the role it will play in boosting housing supply in the borough.

- (c) Applying a number of necessary updates e.g. to reflect Cabinet's approval of a new 10 year contract for the Council's ALMO and recently approved changes to the Council's Allocations Scheme.
- 6.6 Further changes have been necessary as a result of national policy developments. Following the general election in 2015, major changes in national housing, planning and welfare policy were introduced, for example, in the Housing and Planning Act. This context is set out in the revised strategy, which recognises a changing housing landscape that has a significant impact on key strategic priorities including:
- (a) Reducing the supply of affordable homes, as a result of:
- The Right to Buy being extended to housing association tenants
  - 'Starter Homes' being defined as affordable housing, replacing the genuinely affordable rented and shared ownership homes previously required in new developments
- (b) Changing the nature and purpose of social housing in providing settled homes, as a result of:
- The sale of council properties required to fund the government's compulsory levy
  - Fixed term tenancies being required for new lettings (rather than the lifetime tenancies the Council currently offers)
  - 'Pay to Stay' which requires tenants to pay a market rent if they are working with a household income above £40,000.
- (c) Reduced funding to maintain our own housing stock, as a result of:
- The 'Decent Homes' funding programme coming to an end
  - The 1% p.a. rent reduction over 4 years
  - The levy imposed on local authorities to fund the extension of Right to Buy to housing associations
- (d) Making our prevention of homelessness work more difficult, as a result of:
- Welfare reforms including the introduction of Universal Credit which will make those on benefits less likely to be housed by private landlords
  - Reduced benefit caps which will make increasing private sector rents less affordable for those on benefits
  - Changes in the funding for temporary accommodation subsidy, with the replacement of the current management fee per unit with a fixed grant
- 6.7 The strategy has been updated to ensure it reflects recent legislation and government policy, assesses the impact of these changes on residents, the Council and its partners and clearly sets out revised policy commitments which respond to these changes in a way that is consistent with the overall vision and strategic objectives.
- 6.8 There has been a delay in bringing the Strategy forward for final adoption as a result of these significant changes in the housing world. In particular the Housing & Planning Act 2016 has caused considerable uncertainty in the housing sector and several amendments to the Bill were proposed during its passage through Parliament. It should be noted that although the Act received Royal Assent on 12 May 2016, many of its provisions require secondary

legislation and/or the publication of statutory regulations that are not yet available. However, rather than delay further to await these, the Strategy has been finalised reflecting the final provisions of the Act, as amended, and taking into account consideration of its implications and likely impact in conjunction with stakeholders.

### **Proposed Changes to the draft Housing Strategy**

6.9 The changes to the draft Housing Strategy have not resulted in a fundamentally different document. The vision and four strategic objectives are unchanged (with minor wording improvements) and the changes proposed mainly reflect:

- responses to the second consultation exercise, which are summarised in paragraphs 6.3-6.4 above.
- local policy decisions taken since the draft Housing Strategy was approved for consultation in June 2015 which are set out in paragraph 6.5 above.
- national policy changes which have emerged or been clarified since the general election in May 2015, which are set out in paragraph 6.6 above.
- corrections, clarifications and drafting and/or structural improvements.

The proposed final Housing Strategy recommended for approval is attached as appendix 2. The main changes from the draft approved by Cabinet for consultation are summarised below.

#### Local Plan alignment

6.10 As set out in paragraph 6.5 above, a new Local Plan has been approved and it is important to ensure this document and the Housing Strategy are correctly aligned. The Local Plan proposes to reduce the proportion of affordable homes on developments over 10 units from 50% to 40% and of these, a balance of 60% rented and 40% intermediate, except in Tottenham, where these proportions are reversed. These changes are reflected in the revised Housing Strategy.

6.11 The Local Plan also refers to the Tottenham Hale Housing Zone and to new Supplementary Planning Guidance on Planning Obligations, which supports the aims of the Housing Strategy, such as the achievement of wider community benefits through planning gains from housing activities, which are reflected in the strategy.

#### Affordability

6.12 Initial DCLG Guidance on Strategic Housing Market Assessments (SHMA) suggested using an affordability multiple (3.5 times income) to assess whether a household could access open market house purchase, at a lower quartile house price; and 25% of income to assess whether a household could afford a



private rent. However, this is national guidance and in practice the position in London is very different.

- 6.13 The Strategic Housing Market Assessment (2014) for Haringey suggests that households in Haringey are likely to be paying up to 40% of their income towards their housing costs. The draft strategy defined affordability as housing costs being no more than 45% of household net income, reflecting both the current reality for many households and the need to make affordable housing schemes financially viable and deliverable. It is not proposed to change this in the final strategy but in response to consultation feedback, more detailed analysis has been completed and included as appendix D of the strategy.
- 6.14 This analysis defines income bands and the housing tenures accessible to households with those incomes. This shows for example, that households with incomes above £90,000 are considered able to purchase on the open market in Haringey, whilst the different types of affordable housing available should be for households on lower incomes unable to secure housing in the borough without support.
- 6.15 Whilst the revised Housing Strategy recognises there is a role for all types of new affordable housing provision, it re-affirms specific support for new rented homes at affordable rents below Local Housing Allowance (LHA) levels (for households in the lowest income bands). It also introduces a specific expression of support for new low cost shared ownership homes for aspiring home owners, particularly those currently residing in social housing, where a shared ownership completion would release a rented home for re-letting to a household on the Housing Register.
- 6.16 An additional change is the expansion of what is now appendix C of the revised strategy, to set out in one place the Council's preferred affordable housing provision to meet the most acute housing need in the borough. This guides affordable housing providers, including housing associations, private developers, the Development Vehicle and the Council's own development/regeneration teams and sets out the tenure split, affordability and dwelling mix expected for new affordable housing in the borough.

#### *Abolition of lifetime tenancies for new lettings*

- 6.17 Under the Housing and Planning Act 2016, all tenancies granted by a social landlord will be fixed term tenancies of between two and ten years. This undermines the council's commitment in the draft Housing Strategy, to preserve lifetime tenancies, and it has therefore been necessary to amend the Strategy to affirm that the council will implement fixed term tenancies in a way that reassures tenants and future tenants of its intention to preserve settled homes and stable communities. The Council is in any case refreshing its Tenancy Strategy in due course and will need to take account of this provision.

#### *Abolition of the Code for Sustainable Homes*

- 6.18 As part of the Deregulation Act 2015, the Code for Sustainable Homes was abolished, and it is no longer possible for local authorities to require compliance with the standard as part of planning applications. The Housing Strategy

acknowledges this change, but seeks to maintain standards of energy efficiency in the design of new homes, by reference to supporting text in the Mayor's London Plan, encouragement and persuasion of developers to aim for high standards of energy efficiency where possible and promotion of the Built Environment Innovation Hub.

## **Delivery of the Strategy**

- 6.19 It is recognised in the strategy that delivery is not just a matter for the council and the role of partners and stakeholders is crucial e.g. it is acknowledged that most new housing in the borough will be delivered by registered providers and private developers. The strategy also recognises that new ways of working, more innovative delivery, engagement with people and communities and partnership working are all fundamental to successful delivery.
- 6.20 As a high level strategic document, Haringey's Housing Strategy does not set out in detail how delivery of the objectives will be achieved. Although a considerable number of priorities and specific commitments are set out, a range of policies and delivery plans are in place or will be developed to support delivery of the strategy. The current and planned portfolio of these policies is set out in section 9 of the revised strategy.

## **7. CONTRIBUTION TO STRATEGIC OUTCOMES**

- 7.1 The Council's Corporate Plan for 2015-18 sets out the council's overall priorities and programme of work for the period for 2015-18. It identifies housing as one of its five priorities, committing the Council over that period to '*Create homes and communities where people choose to live and are able to thrive*'. Housing also plays a role in delivering across the other priorities in the Corporate Plan, for example through the role that new homes will play in driving the priority for growth and regeneration, or the importance of housing in making sure that children and adults lead the most fulfilling lives that they can.
- 7.2 The Corporate Plan goes on to define specific objectives under each of its five priorities. The role of the Housing Strategy is to flesh out in particular the objectives under Priority 5: to say more clearly what success looks like, to say what the council will do itself and what it expects others to do; and to demonstrate clearly how housing can play a role in meeting our objectives right across every element of the Corporate Plan. In that way, this Strategy is a more detailed development of the high level objectives set out in the Plan.
- 7.3 The Housing Strategy will help deliver the 6 strategic outcomes set out in the Corporate Plan. Examples of how this is achieved are presented below:
- ***prevention and early intervention.***  
This an important theme in the strategy, for example, in the emphasis placed on homelessness prevention.
  - ***fair and equal service***  
This is reflected in the strategy's commitment to mixed communities throughout the borough.
  - ***we will work with communities***



The strategy emphasises the commitment to consulting and engaging with residents, for example, in respect of estate renewal schemes.

- **partnership**  
Delivery of strategy relies on delivery plans which involve all interested organisations in the borough – private landlords, Housing Associations, developers, Residents’ Groups and the Voluntary Sector.
- **customer service**  
This an important theme in the strategy and covers, for example, the quality of management and maintenance of the Council’s housing stock, which amounts to 17% of all residents in the borough, and commits the Council to working to improve housing in other sectors, such as the private rented sector in partnership with private landlords.
- **value for money**  
An example in the strategy relates to setting the expectation that people, and communities will need to do more for themselves and become more resilient and able to resolve problems. The Housing Strategy also aims to ensure that homes and services are delivered cost effectively.

## **8. STATUTORY OFFICERS COMMENTS (CHIEF FINANCE OFFICER (INCLUDING PROCUREMENT), ASSISTANT DIRECTOR OF CORPORATE GOVERNANCE, EQUALITIES)**

### **Finance and Procurement**

- 8.1 The Housing Strategy is a high level objectives and themes document and does not detail specific actions and therefore it is difficult to consider the financial implications of the strategy as a whole. There are likely to be significant financial implications for the Council for both the Housing Revenue Account and the General Fund in executing this strategy but it is expected that these would be considered as part of a formal business case presented once specific proposals have been formulated.

### **Legal**

The Assistant Director of Corporate Governance has been consulted in the preparation of this report and comments as follows.

- 8.2 The Cabinet at its meeting in March 2015 agreed a form of the draft Housing Strategy for consultation after the election. That did not take place and approval for consultation on a revised form of document was then sought; it is the result of that consultation that is now being reported.
- 8.3 Approval of the Housing Strategy is a function reserved to Full Council by Article 4.01(a) of the Council’s Constitution.
- 8.4 The legal advice given to the Cabinet in March 2015 is, for the sake of completeness, included in the following paragraphs.
- 8.5 Under section 41 of the Greater London Authority Act 1999, as amended, (“GLAA99”), it is a general duty of the Mayor of London to prepare and publish a London housing strategy. Under section 333D of GLAA99, any local housing

strategy prepared by a local housing authority in Greater London must be in general conformity with the Mayor of London's London housing strategy,

8.6 Under section 8 of the Housing Act 1985, local housing authorities (including Haringey Council) shall consider and review on a periodical basis the housing conditions in their area and the housing needs of the area with respect to the provision of further housing accommodation. Section 3 of the Housing Act 2004 further imposes a duty on local housing authorities to keep housing conditions in their area under review.

8.7 Since the repeal of section 87 of the Local Government Act 2003 on 26 May 2015 there has been neither a statutory requirement, nor even a regulatory or administrative provision possibly imposing a statutory requirement, to have a Housing Strategy. It is nevertheless recognised as best practice to do so.

8.8 The Secretary of State in the 2007 Green Paper "Homes for the future: more affordable, more sustainable" developed the reference to the local housing authority's strategic role as follows:

*"The local authority strategic housing role is made up of the strategic decisions and activities associated with effective planning and delivery, in order to meet the housing needs of all residents across all tenures. Strong performance in this role will support effective place shaping and help ensure delivery of the wider sustainable community. This requires vision, leadership, planning and delivery at a strategic level to:*

- *assess and plan for the current and future housing needs of the local population across all tenures;*
- *make the best use of the existing housing stock;*
- *plan and facilitate new supply;*
- *plan and commission housing support services which link homes to the support and other services that people need to live in them;*
- *work in partnership to secure effective housing and neighbourhood management on an ongoing basis"*

8.9 Section 225 of the Housing Act 2004 stated that "housing" (for the purposes of carrying out the housing needs review required by section 8 of the Housing Act 1985) includes the accommodation needs of gypsies and travellers residing in their area. From 12 July 2016 this provision is repealed by s124 of the Housing and Planning Act 2016 and replaced by provisions requiring such a housing needs review to include consideration of the need for caravan sites and houseboat moorings.

8.10 The Public Sector Equalities Duty ("PSED") set out in section 149 of the Equality Act 2010 obliges the Council in performing its functions "to have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it”

8.11 The Housing Strategy document itself is not a formal planning document and consequently will not form part of the statutory development plan.

8.12 The Supreme Court has recently endorsed the following general principles of consultation:

- That consultation must be at a time when proposals are still at a formative stage;
- That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
- That adequate time must be given for consideration and response; and
- That the product of consultation must be conscientiously taken into account in finalising any statutory proposals.

8.13 In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

8.14 Since the initial draft of the strategy, and the Stage 1 consultation, the Welfare Reform and Work Act 2016 (“WRWA 2016”) and the Housing and Planning Act 2016 (“HPA 2016”) have been passed (although the latter not yet brought into force in large part), have been passed, which significantly alter the legislative approach to social housing and its finances.

8.15 The WRWA 2016 will impose year on year cuts in rents for social housing between 2016 and 2020, with no guarantee that rent increases will be permitted in subsequent years.

8.16 The HPA 2016 will (when the relevant provisions come into force) require all new Council tenancies to be fixed term, rather than lifetime tenancies; will require Councils to consider the sale of high value Council housing on its becoming vacant and require payments to the Treasury as if the high value properties that the Treasury assumes will be available for sale have been sold; and will require increases in rent for tenants with household incomes in excess of a figure to be set by regulation, but which is expected to be (in London) £40,000, the net assumed return from which will be paid to the Treasury. Each of these will be brought into force by regulations, which have not yet been published and as to the detail of which there is varying clarity.

8.17 These changes will require review of a number of the authority’s strategies, including in particular the Tenancy Strategy.

### **Equality**

8.18 The Council has a public sector equality duty under the Equality Act (2010) to have due regard to; tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act (age, disability, gender

reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); advance equality of opportunity between people who share those protected characteristics and people who do not; and foster good relations between people who share those characteristics and people who do not.

- 8.19 The Equalities Impact Assessment (EqIA) relating to the Housing Strategy is attached as appendix 3. This document was originally approved by the Leader of the Council in June 2015, together with the consultation draft of the Housing Strategy. The EqIA has been updated to reflect the second consultation exercise and to assess the changes in the revised Housing Strategy.
- 8.20 The EqIA has identified ways in which the Housing Strategy can positively impact households with protected characteristics. The strategy will mitigate the adverse impacts of recent legislative changes and improve the delivery of genuinely affordable new housing to low income households, amongst whom protected groups are over represented.
- 8.21 The consultation outcomes summarised in appendix 1 have informed the final version of the EqIA but it should be noted that the span of the strategy means that individual EqIAs will be undertaken for specific policies and delivery plans.
- 8.22 For example, research into previous shared ownership schemes in the borough will be used to inform the Intermediate Housing Policy and its EqIA, to ensure that it maximises the opportunities for all lower income households to be able to access intermediate products, both shared ownership and intermediate market rented homes. This will be addressed by the EqIA for the new Intermediate Housing Policy.
- 8.23 Also, concerns were raised about support for vulnerable groups. The specific initiatives and support mechanisms to be put in place for vulnerable individuals in housing need are covered in the key policies and delivery plans which underpin this strategy, for example the Homelessness Delivery plan, Temporary Accommodation Placements Policy and the recommendations of the supported housing review. The needs of vulnerable groups will be considered in more detail in the impact assessments which accompany these policies and delivery plans.

## **9. USE OF APPENDICES**

Appendix 1 – Summary of responses to second consultation exercise  
Appendix 2 – Haringey’s Housing Strategy 2017-22  
Appendix 3 – Equalities Impact Assessment

## **10. LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

Background Documents:

- 10.1 Regulatory Committee Report 3rd March, 2015: Consultation on Haringey’s draft Housing Strategy 2015-2020

- 10.2 Cabinet report 17<sup>th</sup> March 2015: Consultation on Haringey's draft Housing Strategy 2015-2020
- 10.3 Housing & Regeneration Scrutiny Panel report 3 November 2014 Developing a new Housing Strategy for Haringey: Consultation on Vision, Priorities and Principles
- 10.4 Sources of information as listed in appendix E of the Housing Strategy